



State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF THE EXECUTIVE DIRECTOR

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February 23, 1995

The Honorable Met Johnson
Utah State House of Representatives
P.O. Box 560
New Harmony, Utah 84757

Dear Representative Johnson:

Your February 13, 1995 letter requested information about the environmental investigation and proposed cleanup activities at the Leeds Silver Reclamation Site.

The site was once an acid heap-leach operation which recovered silver and other metals from ore of the Silver Reef Mining District. The concern over potential threats to public health and the environment from hazardous materials on-site was first raised in 1988 by area residents, nearby water users, and the news media. As a result of this attention, several samples were collected by the State and the site was added to CERCLIS, the Environmental Protection Agency (EPA) database of potential Superfund sites.

Subsequent samples from the site show potentially toxic levels of heavy metals in water, sediment, and heap leach material. The water is also very acidic. The Utah Department of Environmental Quality (UDEQ) and the EPA are concerned about these findings, especially since there is evidence the site is used by recreational vehicles and that contaminants may be leaving the site through the air, and ground and surface waters, and migrating to ponds, wetlands, and water used for drinking, irrigation, and stockwatering.

It appears surface water runoff and blowing materials from the heap leach pile may be creating much of the problem. The EPA, through its Emergency Response Branch, has proposed dewatering the on-site ponds and capping the heap-leach pad and pond sediment with a synthetic liner, and soil and rock cover. The EPA also has proposed the removal of polychlorinated biphenyl (PCB)-containing transformers and flammable and caustic materials which are in containers near the site. The UDEQ endorses this approach. Capping the pad will prevent the direct contact exposure to contaminants by those who are driving over the now exposed area and may control the potential migration of contamination from the heap-leach pile.



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The issue was raised about the EPA involvement at this site, with a special concern about the involvement of the State Emergency Response section. After initial samples were evaluated in 1991, the UDEQ requested assistance from EPA's Emergency Response Branch (ERB). ERB is able to address situations which present an acute risk to either public health or the environment. It has funding and enforcement mechanisms which are not available to the UDEQ. This proposed action by the EPA may alleviate long-term Remedial Action concerns and prevent scoring under the Superfund program.

Recently, the UDEQ has initiated a program where owners, operators or other responsible parties may enter into Voluntary Agreements to accomplish site cleanup with the UDEQ oversight. This option has not yet been evaluated or requested for sites in the midst of an ERB Removal Action, and it is not known how the EPA would respond to such a request. However, the UDEQ is willing to work with 5M, to the extent practicable, to pursue a Voluntary Agreement Cleanup option (5M operated the reclamation facility and still owns a significant portion of the site.) We are also willing to ask the EPA to delay its proposed Removal Action if 5M demonstrates a willingness to restore the site to conditions which are protective of human health and the environment.

Please do not hesitate to call me if we can be of further assistance. For questions specific to the Leeds site, you may also contact Jason Knowlton at (801) 536-4100.

Best regards,



Dianne R. Nielson, Ph.D.
Executive Director

cc: Senator Orrin Hatch
Representative James Hansen
Pete Stevenson, U.S. Environmental Protection Agency, Region VIII
William Yellowtail, U.S. Environmental Protection Agency, Region VIII
Wayne Thomas, Utah Department of Environmental Quality, Southwest District Engineer
Gary L. Edwards, Director, Southwest Utah Public Health Department
~~Colin Korpi~~ Angel Springs Water District